

SUBMISSION ON TRANSPOWER'S NOTICES OF REQUIREMENT AND APPLICATIONS FOR RESOURCE CONSENTS

Section 145 of the Resource Management Act 1991

RECEIVED CN

- 4 OCT 2007

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To: Minister for the Environment
Freeport Grid Upgrade Submissions
PO Box 4405
Hamilton East
HAMILTON 3247

OR Email: tpcallin@mfe.govt.nz
Fax: 04 439 7700
[If you are emailing or faxing your submission, please make it for the attention of "Grid Upgrade Submissions"]

This submission relates to the notices of requirement and/or applications for resource consent, lodged by Transpower New Zealand Ltd for the North Island Grid Upgrade Project, and identified on the next page.

CLOSING DATE FOR SUBMISSIONS: 5 OCTOBER 2007

Title: _____
My/Our Full Name(s): Regis Park Stage 2 Limited
Postal Address: PO Box 151 Whitford, Manukau 2149
Wk Ph: 09 530 9111 Hm Ph: _____ Cell: 021595415
Wk Fax: 09 530 9222 Hm Fax: _____ Email: mark@regis.co.nz

Please tick the relevant boxes on the next page to identify whether you are making a submission on all notices of requirement and applications for resource consents or just some of them (please identify).

Please also indicate on the back of this form (✓) whether you support, oppose, or are neutral in relation to the notice(s) of requirement and applications for resource consents. If you are making a submission only on parts of a notice of requirement or application for resource consents, please note this when specifying the reasons for your submission.

The reasons for my/our submission are:

As set out on the attached material.

If you are attaching further information tick (✓) for yes

Please use more pages if you need to.

I/we seek the following decision from the Board of Inquiry (provide precise details including the nature of any conditions sought):

As set out on the attached material.

Please use more pages if you need to.

Use a clear tick in the appropriate box below (✓)

I/we wish to be heard in support of my/our submission (to speak at the public hearing).

I/we DO NOT wish to be heard and hereby make my/our submission in writing only.

Signature(s): _____

Date: _____

(Signature of submitter, or person authorised to sign on their behalf is required. Note signature is not required for electronic (email) submissions. If this is a joint submission by two or more individuals, each individual's signature is required.)

Use the tick boxes below to indicate the called-in notices of requirement and applications for resource consents that your submission concerns. Use a clear tick in the appropriate box or boxes (✓).

I/we make my/our submission concerning all notices of requirements and applications for resource consents below.

OR

My/our submission only concerns the notices of requirement and applications for resource consents that I/we have ticked below.

	Support	Oppose	Neutral
Manukau City Council			
Pakuranga Substation Notice of Requirement. Reference No. 27619		✓	
Otahuhu Substation Notice of Requirement. Reference No. 27619		✓	
Brownhill Substation Notice of Requirement. Reference No. 27619		✓	
Underground Cable – Pakuranga to Brownhill Notice of Requirement. Reference No. 27619		✓	
Underground Cable – Otahuhu to Brownhill Notice of Requirement. Reference No. 27619		✓	
Overhead Line Notice of Requirement. Reference No. 27619		✓	
Franklin District Council			
Overhead Line Notice of Requirement. Reference No. L07089			✓
Waikato District Council			
Overhead Line Notice of Requirement. Reference No. DES0011/07			✓
Matamata-Piako District Council			
Overhead Line Notice of Requirement. Reference No. RMR200621			✓
Waipa District Council			
Overhead Line Notice of Requirement. Reference No. DN/0006/07			✓
South Waikato District Council			
Overhead Line Notice of Requirement. Reference No. 240/021			✓
Taupo District Council			
Overhead Line Notice of Requirement. Reference No. RM070209			✓
Whakamaru and Whakamaru North Substation Notice of Requirement. Reference No. RM070209			✓
Auckland Regional Council – Resource Consents			
<i>Pakuranga to Brownhill Underground Cable Resource Consents</i>			
Application 34102: Land Use Consent for earthworks		✓	
Application 34370: Discharge of Contaminants to land from ancillary activities that produce wastewater or washwater		✓	
Application 34372: Works in the Bed of a Watercourse		✓	
Application 34373: Diversion of Surface Water		✓	
<i>Overhead Line and Brownhill Substation Resource Consents</i>			
Application 34711: Land Use Consent for earthworks		✓	
Application 34712: Discharge of Contaminants to land		✓	
Environment Waikato – Resource Consents			
<i>Overhead Line and Whakamaru North Substation Resource Consents</i>			
Application 116902: Land Use Consent for vegetation clearance and earthworks			✓
Application 116903: Discharge Permit for the composting of vegetation			✓
Application 116904: Land Use Consent for the drilling of tower foundation below the water table			✓
Application 116905: Discharge Permit for the discharge of site water and drilling fluids from drilling activities into surface water.			✓

NOTE: A copy of this submission form must be sent as soon as possible at:

**North Island Grid Upgrade Project, Transpower Freeport 182915, PO Box 1021, Wellington
or email submissions@transpower.co.nz or fax 04 819 7624.**

I/we make my/our submission concerning all notices of requirements and applications for resource consents below.

Regis Park Stage 2 Limited

Attached Material

A. Reasons for Submission

Regis Park Stage 2 Limited is primarily concerned with the location of the substation at Whitford and the easement for underground cable through its property in Manukau City. However, it considers the project proposed by Transpower from Whakamaru to Auckland is flawed in concept and is not conducive to the sustainable management of natural and physical resources. Transpower has failed to take into account environmental concerns resulting from the proposed project. Transpower have failed to properly cost the alternative underground route from Ardmore to Otahuhu. Transpower have failed to obtain independent checks on their assumptions on the likely costs of compensation for land and access through Whitford and other parts of Manukau. Transpower have been unable to make a fair cost comparison on alternatives to their preferred routes. The Electricity Commission does not appear to have requested this peer review and analysis of the alternatives based on realistic land values in the area.

The underground route from Otahuhu to Brownhill.

The submitters land at 227 Brownhill Road was bought some years ago specifically for development by the Company. This land is the first parcel of land not owned by Transpower through which the proposed underground cable to Otahuhu will pass.

Transpower's intentions to place power lines over, and later the substation beside, the property owned by the submitter has caused massive business interruption to the submitter ever since the project started in 2005.

Transpower's Notice of Requirement over land in Whitford, finally lodged with Manukau City Council in March/April 2007, had an immediate and detrimental impact on the land and the ability of the owners to develop it. Prior to Notification, Transpower was aware of the development plans for the property and the existing Resource Consent from Manukau City Council for the development of the first 20 sections. The easement proposed by Transpower will run through the middle of the land. Transpower have stated that the underground cable that will be installed at some time in the future is unlikely to be built for 20 years or more. Transpower has failed to take account of alternative routes underground through South Auckland to Otahuhu and Pakuranga and has failed to take account of future generation closer to Auckland with alternate routes to Otahuhu and Pakuranga. In addition Transpower have failed to properly assess compensation for the

impact of the proposed easement on this property and also have failed to properly cost the alternative costs of undergrounding from Ardmore to Otahuhu and Pakuranga. Their assumption has been based on the Auckland urban boundary ending at Whitford, which is quite incorrect now and will be even more flawed in 20 years time.

Undergrounding line in Manukau City

The submitter has viewed the submission and endorses and adopts all of the submissions for undergrounding in Manukau.

The Brownhill Substation

The location of this proposed site is highly visible to existing residential dwellings and to proposed dwelling sites on the adjacent property owned by the submitter that overlook the proposed site. We understand an alternative site is available in the immediate vicinity that is not so visually obtrusive and moving the substation to that location would better meet the purposes of the Act.

Transpower have publicly stated that it will only be implementing the gas insulated substation option at this substation. That should be confirmed by a condition on the requirement.

Underground Route from Pakuranga to Brownhill

Transpower have publicly stated that it will only be implementing the Sandstone, Whitford Park, Brownhill Roads route. That should be confirmed by a condition on the requirement.

Rehabilitation of Brownhill Road post undergrounding should include landscape enhancement to better accord with the purpose of the Act.

B. Decision Sought

1. Underground Cable – Brownhill to Otahuhu (Reference No. 27619)
Decline the Notice of Requirement or alternatively Impose conditions:

2. Brownhill Substation Notice of Requirement (Reference No. 27619)
Decline the Notice of Requirement or alternatively impose conditions:
 - (a) limiting the implementation of the Notice to the fully enclosed gas insulated substation option only;
 - (b) mitigating the visual impacts of the substation by improved landscaping, including planting the remainder of the site, or alternatively moving to an alternate less visually obtrusive site.

3. Underground Cable – Pakuranga to Brownhill Notice of Requirement (Reference No. 27619):
Decline the Notice of Requirement or alternatively Impose conditions:
 - (a) limiting the implementation of the Notice to the Sandstone, Whitford Park and Brownhill Roads route;
 - (b) requiring beautification of Brownhill Road.

4. Overhead Line Notice of Requirement in Manukau City (Reference No. 27619):
Decline the Notice of Requirement or alternatively modify it and impose conditions to require that the entire route of the line in Manukau City be placed underground.

5. Decline the whole project and all of the Notices of Requirement and require Transpower to have the project reviewed in the light of advances in technology overseas and a full analysis of the power needs for the whole of New Zealand.

6. Such other relief that satisfies the concerns of Regis Park Stage 2 Limited.